

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

In re:

ANGEL M. ARAVENA,

Debtor.

Case No.: 8:16-bk-00392-CPM  
Chapter 7

**DEBTOR'S OBJECTION TO SUNCOAST CREDIT UNION'S  
MOTION FOR RELIEF FROM STAY REGARDING REAL PROPERTY**

COMES NOW, the Debtor, ANGEL M. ARAVENA, by and through the undersigned attorney, and files his Objection to Suncoast Credit Union's Motion for Relief from Stay Regarding Real Property, and would respectfully show as follows:

1. Debtor admits a deficiency judgment entered for \$348,201.25.
2. Debtor denies as there is no binding agreement which has been consummated.
3. Debtor denies there is no equity for the debtor or the estate as interest from October 25,

2012, on \$347,000.00, would bring the current claim to over the amount of the deficiency judgment.

Debtor does not claim this possible equity and only submits this objection to protect the interests of the estate until this matter is acted upon by the Trustee.

WHEREFORE, the Debtor, ANGEL M. ARAVENA, requests that the Court consider the

objection herein.

Respectfully submitted,  
JOSEPH R. FRITZ, P.A.

BY: 

**JOSEPH R. FRITZ, ESQUIRE**

Florida Bar Number 321931

4204 North Nebraska Avenue

Tampa, Florida 33603

Office: (813) 237-4646

Fax: (813) 238-5182

[Joe@fritzlawfl.com](mailto:Joe@fritzlawfl.com)

[Lisa@fritzlawfl.com](mailto:Lisa@fritzlawfl.com)

Attorney for Debtor

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to Larry M. Foyle, Esquire, Kass Shuler, P.A., P.O. Box 800, Tampa, FL 33601; Angel M. Aravena, 9457 Forest Hills Place, Tampa, FL 33612; Gladys Aravena, 793 Duque Road, Lutz, FL 33549; and Douglas N. Menchise, Chapter 7 Trustee, 2963 Gulf to Bay Boulevard, Suite 300, Clearwater, FL 33759; by Electronic Mail via the Court's Electronic Mailing System (CM/ECF), this 5<sup>th</sup> day of February, 2016.

  
**JOSEPH R. FRITZ, ESQUIRE**